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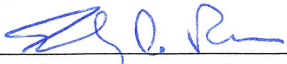
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September 18, 2017

Via ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

The application is ☒ granted
_____ denied


Edgardo Ramos, U.S.D.J.

Dated: 9/19/2017

New York, New York

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I, along with Donald Duboulay, represent Mr. Ahmed El Gammal, having been appointed following his conviction at trial in January of this year. We write to ask for a 60-day extension of the deadlines for post-trial motions in this case.

Mr. Doublay and I have coordinated with prior counsel, the government and the United States Department of Justice Litigation Security personnel to transfer all case files and obtain access to classified materials. After reviewing all pre-trial and trial materials and familiarizing ourselves with the record and possible areas for post-trial briefing, we have had several meetings with our client. In order, however, to refine the post-trial briefing process, we believe that we need some additional time to meet further with Mr. El Gammal. Without such additional time to coordinate with our client, we will not be able to effectively address any potential post-trial briefing issues.

Currently, post-trial defense motions are due on September 29, 2017. To allow us the time to engage with our client about post-trial motions and potentially narrow the issues to be addressed, we ask that this Court extend all briefing deadlines by 60 days. This is the third such request for an adjournment since Mr. Duboulay and I were appointed by this Court. The government consents to the request.

Accordingly, we ask that this Court set the deadlines for any defense motions as November 28, 2017, government opposition as December 22, 2017 and defense reply as January 12, 2018 (to account for scheduling complications over the winter holiday period.)

Respectfully submitted,

/s/ Megan W. Benett

cc: All counsel of record via ECF/CM

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